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March 3, 2005

Carlton Dasent, Esq.
27 School Street, Suite 400
Boston, MA 02108

RE: Pechner-James and Fernandez v. City of Revere, et als

Dear Attorney Dasent:

In review of plaintiff Sonia Fernandez's discovery replies sent to my office I noticed various failures in her attempt to comply with Defendants' Request for Production of Documents. It appears that several of the requests were not adequately complied with. The following is a list of the inadequacies that need to be addressed:

1. Plaintiff's response to Defendants' Request Number 1 fails to provide the treatment, diagnosis or prognosis reports of Sonia Fernandez from Jason Merola, M.D., Darlene Millman, M.D. or Christopher Harmon, M.D.;
2. Defendants' Request Numbers 2 and 13 requested medical records of treatment and examinations for Sonia Fernandez five years before the date of the incidents to the present. It does not matter if it is related to the incident or not. This includes counseling, therapist, doctors, clinics or any health care provided. To this date we have not received these records or told that they do not exist; and
3. Defendants' Request Numbers 5, 6, 8, 10, 12, 16, and 18 through 22, requested that all documents be produced in relation to the requests. Your response indicates it includes the documents that are listed but then goes on to state they "are not limited to the documents listed." This is not acceptable. If there are other documents then there must be provide unless you have a legitimate objection.

Therefore, I am requesting that you provide complete responses to Defendants' Request for the Production of Documents to this office in order to satisfy your discovery obligations.

Should you have any questions please feel free to contact me.

Very truly yours,


John K. Vigliotti

cc: Paul Capizzi, City Solicitor